

# Exhibit B

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7 *Plaintiffs*

8  
9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**  
12

13 IN RE: CATHODE RAY TUBE (CRT)  
14 ANTITRUST LITIGATION

MASTER FILE NO. 07-cv-5944 SC

MDL NO. 1917

15 This Document Relates to:  
16 ALL DIRECT PURCHASER ACTIONS

**DIRECT PURCHASER PLAINTIFFS'  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT MT PICTURE DISPLAY  
CO., LTD.'S FIRST SET OF DOCUMENT  
REQUESTS**

18  
19 PROPOUNDING PARTY: MT PICTURE DISPLAY CO., LTD.

20 RESPONDING PARTY: DIRECT PURCHASER PLAINTIFFS

21 SET NO.: ONE

22 Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, the Direct Purchaser  
23 Plaintiffs ("Plaintiffs") hereby respond to defendant MT Picture Display Co., Ltd.'s First Set of  
24 Request for Production of Documents as follows:

25 **PRELIMINARY STATEMENT**

26 Nothing herein should be construed as an admission by Plaintiffs respecting the  
27 admissibility or relevance of any fact or document, or of the truth or accuracy of any  
28 characterization or statement of any kind contained in defendant MT Picture Display Co., Ltd.'s

MDL NO. 1917

DIRECT PURCHASER PLAINTIFFS' SUPPLEMENTAL RESPONSES TO  
DEFENDANT MT PICTURE DISPLAY CO., LTD.'S FIRST SET OF DOCUMENT REQUESTS

1 First Set of Request for Production of Documents (“Request for Production”). Plaintiffs have not  
 2 completed their investigation of the facts relating to this case or its preparation for trial. All  
 3 responses and objections contained herein are based only upon such information and such  
 4 documents as are presently available to and specifically known to Plaintiffs. It is anticipated that  
 5 independent investigation, legal research and analysis will supply additional facts and add  
 6 meaning to known facts, as well as establish entirely new factual conclusions and legal  
 7 contentions, all of which may lead to substantial additions to, changes in and variations from the  
 8 responses set forth herein.

9 The following objections and responses are made without prejudice to Plaintiffs' right to  
 10 produce at trial, or otherwise, evidence regarding any subsequently discovered information,  
 11 evidence and/or documents. Plaintiffs accordingly reserve the right to modify and amend any and  
 12 all responses herein as research is completed and contentions are made.

### 13 **GENERAL OBJECTIONS**

14 Plaintiffs object generally to the Request for Production, and to each individual request  
 15 therein, on the following grounds, each of which is incorporated by reference in the responses to  
 16 the individual requests below. Each response set forth below incorporates, is subject to, and does  
 17 not waive any of these general objections.

18 1. Plaintiffs object to each and every request to the extent that it seeks disclosure of  
 19 information containing privileged communications or other matters protected by the attorney-  
 20 client privilege, the work-product doctrine, or any other applicable privilege or doctrine. None of  
 21 Plaintiffs' specific responses shall be construed to mean that Plaintiffs intend to provide privileged  
 22 or work-product information in the absence of an intentional waiver. Any inadvertent disclosure  
 23 of privileged or work-product information shall not constitute a waiver of an otherwise valid claim  
 24 of privilege or other protection, and any failure to assert a privilege or other protection as to  
 25 certain information shall not be deemed to constitute a waiver of the privilege or other protection  
 26 as to any other information so protected.

27 2. The Request for Production, and certain of the requests contained therein, are  
 28 unreasonably overbroad in scope, and thus burdensome and oppressive, in that each such request

1 seeks information pertaining to items and matters that are not relevant to the subject matter of this  
2 action, or, if relevant, are so remote therefrom as to make its disclosure of little or no practical  
3 benefit to defendant, while placing a wholly unwarranted burden and expense on Plaintiffs in  
4 locating, reviewing and producing the requested information.

5         3.       The Request for Production, and certain of the requests contained therein, are  
6 burdensome and oppressive, in that ascertaining the information necessary to respond thereto, and  
7 to produce documents in accordance therewith, would require the review and compilation of  
8 information from multiple locations, and voluminous records and files, thereby involving  
9 substantial time of Plaintiffs' employees and great expense to Plaintiffs, whereas the information  
10 sought to be obtained by defendant would be of little use or benefit to defendant.

11         4.       The Request for Production, and certain of the requests contained therein, purports  
12 to impose on Plaintiffs obligations or responsibilities in excess of those imposed by the Federal  
13 Rules of Civil Procedure, the applicable Local Rules, any other applicable procedural rules, case  
14 law, statutes governing the proper scope of discovery, or applicable Court Orders.

15         5.       The Request for Production, and certain of the requests contained therein, calls for  
16 documents which are outside the possession, custody or control of Plaintiffs.

17         6.       Plaintiffs object to each request, instruction, or definition to the extent it seeks  
18 information that is already in the possession of the propounding party or the other defendants or is  
19 obtainable from some other source that is more convenient, less burdensome or less expensive.

20         7.       Plaintiffs object to each request, instruction, or definition to the extent that it  
21 impermissibly seeks the premature disclosure of experts and expert information or requires  
22 Plaintiffs to disclose analyses, comparative analyses, opinions, or theories that will be the subject  
23 of expert testimony.

24         8.       To the extent any term in the Request for Production is defined in the Federal  
25 Rules of Civil Procedure, Plaintiffs will interpret such term as it is so defined and not as defined in  
26 the Request for Production.

27         9.       The Request for Production, and certain of the requests contained therein, seek to  
28 have Plaintiffs furnish information and identify documents that are a matter of public record and,

1 therefore, are equally available to the propounding party as they are to Plaintiffs.

2 10. Plaintiffs' responses agreeing to produce documents in response to the requests  
3 should not be construed as meaning that documents of the type requested exist, and should only be  
4 construed as indicating that Plaintiffs will produce documents of the type requested if they are in  
5 Plaintiffs' possession, custody or control, are not privileged or otherwise exempt from production,  
6 and can be located and produced through reasonable and good faith effort.

7 **RESPONSES**

8 **REQUEST FOR PRODUCTION NO. 1:**

9 All Documents that support Your response to Interrogatory No. 2.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

11 Plaintiffs incorporate the General Objections as though fully set forth herein. Plaintiffs  
12 further object to this request to the extent it calls for the production of information protected by the  
13 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or  
14 that is otherwise privileged or immune from discovery. Subject to, and without waiving, the  
15 foregoing objections, plaintiffs respond as follows:

16 Plaintiffs shall produce documents described in their response to MT Picture Display Co.,  
17 Ltd.'s Interrogatory No. 2.

18 **REQUEST FOR PRODUCTION NO. 2:**

19 All Documents that support Your response to Interrogatory No. 3.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

21 Plaintiffs incorporate the General Objections as though fully set forth herein. Plaintiffs  
22 further object to this request to the extent it calls for the production of information protected by the  
23 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or  
24 that is otherwise privileged or immune from discovery. Subject to, and without waiving, the  
25 foregoing objections, plaintiffs respond as follows:

26 Plaintiffs shall produce documents described in their response to MT Picture Display Co.,  
27 Ltd.'s Interrogatory No. 2.

28 **REQUEST FOR PRODUCTION NO. 3:**

1 All Documents that support Your response to Interrogatory No. 4.

2 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

3 Plaintiffs incorporate the General Objections as though fully set forth herein. Plaintiffs  
4 further object to this request to the extent it calls for the production of information protected by the  
5 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or  
6 that is otherwise privileged or immune from discovery. Subject to, and without waiving, the  
7 foregoing objections, plaintiffs respond as follows:

8 Plaintiffs shall produce documents described in their response to MT Picture Display Co.,  
9 Ltd.'s Interrogatory No. 2.

10 **REQUEST FOR PRODUCTION NO. 4:**

11 All Documents that support Your response to Interrogatory No. 5.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

13 Plaintiffs incorporate the General Objections as though fully set forth herein. Plaintiffs  
14 further object to this request to the extent it calls for the production of information protected by the  
15 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or  
16 that is otherwise privileged or immune from discovery. Subject to, and without waiving, the  
17 foregoing objections, plaintiffs respond as follows:

18 Plaintiffs shall produce documents described in their response to MT Picture Display Co.,  
19 Ltd.'s Interrogatory No. 2.

20 **REQUEST FOR PRODUCTION NO. 5:**

21 All Documents that support Your response to Interrogatory No. 6.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

23 Plaintiffs incorporate the General Objections as though fully set forth herein. Plaintiffs  
24 further object to this request to the extent it calls for the production of information protected by the  
25 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or  
26 that is otherwise privileged or immune from discovery. Subject to, and without waiving, the  
27 foregoing objections, plaintiffs respond as follows:

28 Plaintiffs shall produce documents described in their response to MT Picture Display Co.,

1 Ltd.'s Interrogatory No. 2.

2 **REQUEST FOR PRODUCTION NO. 6:**

3 All other documents that purportedly support Your allegations that Defendants conspired,  
4 combined and contracted to fix, raise, maintain, and stabilize the price at which finished products  
5 containing CRTs were sold in the United States, or agreed to allocate market shares and customers  
6 of sales of finished products containing CRTs.

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

8 Plaintiffs incorporate the General Objections as though fully set forth herein. Plaintiffs  
9 further object to this request to the extent it calls for the production of information protected by the  
10 attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege, or  
11 that is otherwise privileged or immune from discovery. Subject to, and without waiving, the  
12 foregoing objections, plaintiffs respond as follows:

13 Plaintiffs shall produce documents described in their response to MT Picture Display Co.,  
14 Ltd.'s Interrogatory No. 2.

15  
16 DATED: January 31, 2011

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